

DOUGLAS C. FOSTER, CA #205674
Law Offices of Douglas C. Foster
3185 M. Street; Suite 200
Merced, CA 95348
Telephone: (209) 691-7280
Fax: (209) 691-7290

Attorney for Defendant
JACOB JACOBSEN

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JACOB JACOBSEN,

Defendant.

Case No. 1:22-cr-00304-NODJ-BAM

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL
ACT; FINDINGS AND ORDER

PROPOSED DATE: November 6, 2024
TIME: 9:00 a.m.
COURT: Hon. Jennifer L. Thurston

This case is scheduled for change of plea hearing on September 9, 2024. The parties have agreed to move this hearing to November 6, 2024.

Plaintiff, by and through its counsel of record, and defendant by and through his counsel of record hereby stipulate as follows:

1. By previous order this matter was set for a change of plea hearing on September 9, 2024.
2. By this stipulation, the parties agree that the change of plea hearing may be continued to November 6, 2024, and to exclude time between those two dates.
3. The parties agree, and request that the Court find the following:
 - a. A continuance is required to permit a defense expert to complete her work and for counsel to consult with his client concerning the results of the evaluation.

- 1 b. Defense counsel awaits the expert report in order to present potential
2 mitigating information to the government that may impact the specifics of Mr.
3 Jacobsen's plea.
4
5 c. Both parties consent to this continuance and agree that time should continue to
6 be excluded under the Speedy Trial Act, under 18 U.S.C. §§3161(h)(1)(A),
7 (7)(A) and (h)(7)(B)(iv), up to and including November 6, 2024 for purposes
8 of defense preparation and settlement negotiation.
9

10 IT IS SO SIPULATED:

11
12 PHILLIP A. TALBERT
 United States Attorney

13
14 DATED: 8/28/24

 /s/David Gappa
 DAVID GAPPA
 Assistant United States Attorney
 Attorney for Plaintiff

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18 DATED: 8/28/24

 /s/ Douglas Foster
 DOUGLAS C. FOSTER
 Law Offices of Douglas C. Foster
 Attorney for Defendant
 JACOB JACOBSEN

ORDER

IT IS SO ORDERED that the change of plea hearing is continued from September 9, 2024, to **November 6, 2024, at 8:30 a.m. in Courtroom 5 before the District Court Judge.**

Time is excluded pursuant to 18 U.S.C. §§3161(h)(1)(A), (7)(A) and (h)(7)(B)(iv).

IT IS SO ORDERED.

Dated: **August 28, 2024**

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE